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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MATT HOSSEINZADEH,

*Plaintiff,*

– vs –

ETHAN KLEIN and HILA KLEIN,

*Defendants.*

**Civ. No. 16-cv-3081 (KBF)**

**NOTICE OF MOTION TO DISMISS THE  
AMENDED COMPLAINT PURSUANT  
TO FED. R. CIV. P. 12(b)(6)**

SIRS:

PLEASE TAKE NOTICE defendants Ethan Klein and Hila Klein hereby move to dismiss the Amended Complaint filed by plaintiff Matt Hosseinzadeh pursuant to Fed. R. Civ. P. 12(b)(6). This motion is based upon the declarations of Ethan Klein and Michael Lee and all prior pleadings and proceedings herein. A memorandum of law is also submitted in support of defendants' motion.

Pursuant to the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, any opposition to this motion shall be served within fourteen (14) days after service of the motion. Reply papers, if any, shall be served seven (7) days after service of the opposing papers.

The Court will determine whether argument will be heard and, if so, will advise counsel of the argument date.

Date: June 27, 2016

**MORRISON & LEE LLP**



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